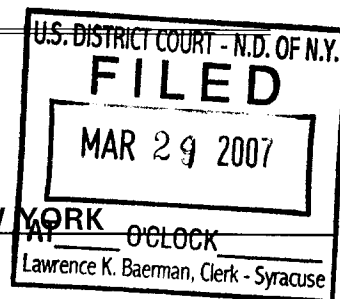


*United States District Court*

NORTHERN

DISTRICT OF

NEW YORK



UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

Case Number: 5:07-MJ-102 (GJD)

KEVIN J. GREEN

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 22, 2007 in Onondaga County, in the Northern District of New York defendant did, (Track Statutory Language of Offense)

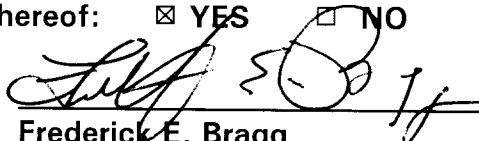
by force or violence, or by intimidation, take from the person or presence of another, any property or money belonging to, or in the care, custody, control, management, or possession of, any bank or credit union

in violation of Title 18, United States Code, Section(s) 2113(a) & (d)

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:

Official Title

Continued on the attached sheet and made a part hereof: ☒ YES ☐ NO

  
 Frederick E. Bragg  
 Signature of Complaint

Sworn to before me, and subscribed in my presence,

March 29, 2007  
 Date

at

Syracuse, New York  
 City and State

Hon. Gustave J. DiBianco  
United States Magistrate Judge  
 Name and Title of Judicial Officer

  
 Signature of Judicial Officer

NORTHERN DISTRICT OF NEW YORK

SYRACUSE, NEW YORK

State of NEW YORK

County of ONONDAGA

AFFIDAVIT

1. I, FREDERICK E. BRAGG, duly state that I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Syracuse Resident Agency. I have been so employed since July, 1991. My assignments include investigating violations of Federal Law, specifically violent criminal offenses.

2. I am the FBI case agent assigned to the robbery that occurred at the ACMG Federal Credit Union, 1753 Milton Avenue, Solvay, New York on March 22, 2007. The information provided in this affidavit is from personal knowledge and from information received from other law enforcement officers involved in this investigation.

3. On Thursday, March 22, 2007, at approximately 4:15 PM, an individual entered the ACMG Federal Credit Union, 1753 Milton Avenue, Solvay, New York, and entered the customer line. A few moments later, the subject approached a credit union teller and presented a note that was written on the back side of a check. The note read, "This is a robbery, give me the money." The subject then grabbed the right wrist of the victim teller. The subject then reached over the counter with his free hand and took currency from the teller's open

1 cash drawer. As he was grabbing the money, the subject  
2 stated, words to the effect of, "Give me those bills there."  
3 The subject then ran out of the credit union.

4 4. An audit conducted by credit union employees subsequent  
5 to the robbery revealed that the loss was \$850.00 in  
6 federally insured credit union funds.

7 5. The demand note utilized during this robbery was written  
8 on the back of a check in the name of Carol S. Green of  
9 Syracuse, New York.

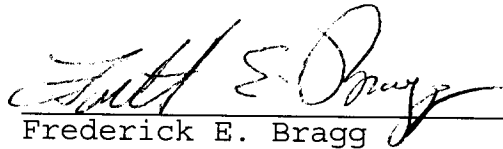
10 6. Carol S. Green's husband is Kevin J. Green, date of birth  
11 4/17/1961. A criminal history check of Kevin J. Green  
12 reveals numerous previous felony convictions in the State of  
13 New York, including a 2000 felony conviction for a robbery of  
14 a bank in the Town of Dewitt. Kevin S. Green fits the  
15 description provided by witnesses at the credit union.

16 7. A photographic spread containing Kevin J. Green was  
17 prepared by detectives of the Onondaga County Sheriff's  
18 Department (OCSD). This spread was individually shown to the  
19 victim teller as well as other witnesses at the credit union.  
20 All positively identified Kevin J. Green as the person  
21 responsible for the 4/22/2007 robbery of the ACMG Federal  
22 Credit Union in Solvay, New York.

23 8. On March 23, 2007, Kevin J. Green was contacted by OCSD  
24 Detectives. After being provided his Miranda warnings, Green  
25 admitted that he was responsible for the robbery of the ACMG  
26 Federal Credit Union on March 22, 2007. Green provided a  
27 voluntary affidavit regarding the incident.

28 9. The deposits of the ACMG Federal Credit Union are insured

1 by the National Credit Union Administration (NCUA).  
2  
3

4 

5 Frederick E. Bragg  
6 Special Agent  
7 Federal Bureau of Investigation  
8 Syracuse, New York

9  
10 Subscribed and sworn to before me this 29<sup>th</sup> day of March,  
11 2007  
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U.S. Magistrate